

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CR No. 19-2328 MLG
)	
vs.)	
)	
TIMOTHY BACHICHA,)	
)	
Defendants.)	

**UNITED STATES' RESPONSE AND OBJECTIONS TO THE DEFENDANT'S
WITNESS LIST FILED DECEMBER 13, 2023 (DOC. 169)**

The United States hereby responds to the Defendant's witness list filed December 13, 2023 (Doc. 169). Since the filing of the witness list, the defense has informed the Government that they no longer wish to call Mr. Lucero. Therefore, the Government will not respond to the notice of Mr. Lucero as a defense witness.

1. Anthony Castillo – The United States does not object to the proposed testimony.
2. Larry Saiz - The United States does not object to testimony about Mr. Saiz selling the Ford Excursion to Mr. Bachicha. It does object to proposed testimony the vehicle was never operated in any commercial capacity nor driven out of the state of New Mexico. The United States believes the testimony by Special Agent Fondse will eliminate the need to call Mr. Saiz.

The filing of this document in CM/ECF caused a copy to be served on counsel for Defendant.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ
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